

BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon
ETHAN D. KNIGHT, OSB #992984
GEOFFREY A. BARROW
CRAIG J. GABRIEL, OSB #012571
Assistant United States Attorneys
ethan.knight@usdoj.gov
geoffrey.barrow@usdoj.gov
craig.gabriel@usdoj.gov
1000 SW Third Ave., Suite 600
Portland, OR 97204-2902
Telephone: (503) 727-1000
Attorneys for United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:16-CR-00051-BR

v.

AMMON BUNDY, et al.,
Defendants.

GOVERNMENT’S RESPONSE TO
DEFENDANTS’ MOTION TO
INSPECT GRAND JURY MINUTES
RECORDS (#481)

The United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and through Ethan D. Knight, Geoffrey A. Barrow, and Craig J. Gabriel, Assistant United States Attorneys, hereby responds to defendants’ Motion to Inspect Grand Jury Minutes, Rolls, Master Wheel, and All Records of the Grand Jury Selection Process (ECF No. 481), filed by defendant Ryan Bundy on behalf of all defendants.

Defendant’s Motion seeks an order allowing him or his authorized agent “to inspect the grand jury minutes, rolls, master wheel, and all other records of the grand jury selection process in this case.” (Def.’s Mot. 1-2). At the May 4, 2016, status conference, the Court identified

the grand juries that heard defendants' case and provided information regarding the selection of grand jurors in the District of Oregon. At that time, the Court indicated that it would disclose additional information regarding the grand jury selection process by way of an affidavit from the Court's Jury Administrator.

On May 11, 2016, Teresa D. Glover, Jury Administrator for the U.S. District Court for the District of Oregon filed a Declaration in this case (ECF No. 538). Ms. Glover's Declaration outlined and attached the district's Juror Management Plan. The Declaration explains the district's master jury wheels and provided a detailed description of the selection and composition of the grand juries that heard defendants' case.

The government believes that the information provided by the Court and set forth in Ms. Glover's Declaration addresses Mr. Bundy's Motion. The government reached out to Ms. Ludwig, Ryan Bundy's attorney advisor, to determine if there are outstanding issues, but has not heard back from her.

In light of the information provided by the Court and the Declaration filed in this case, defendant's Motion to Inspect should be denied as moot.

Dated this 16th day of April 2016.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Geoffrey A. Barrow
ETHAN D. KNIGHT, OSB #992984
GEOFFREY A. BARROW
CRAIG J. GABRIEL, OSB #012571
Assistant United States Attorneys